INTERVENTION



BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

Arizona Corporation Commission

DOCKETED

DEC 3 0 2002

2002 DEC 30 P 4: 44

AZ CORP COMMISSION DOCUMENT CONTROL

DOCKETED BY (AM

ARIZONA CORPORATION COMMISSION,

Complainant,

v.

OWEST CORPORATION,

Respondent.

Docket No. T-01051B-02-0871

APPLICATION OF AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC. FOR LEAVE TO INTERVENE

AT&T Communications of the Mountain States, Inc. ("AT&T") hereby applies, pursuant to Rule 14-3-105 of the Arizona Corporation Commission Rules of Practice and Procedure, to intervene in the above-captioned proceeding and states the following:

- 1. AT&T is a telecommunications corporation certified to provide local exchange, intraexchange, and interexchange telecommunications in Arizona. As a competitive local exchange carrier, AT&T purchases interconnection services and unbundled network elements from Qwest and is charged rates set by the Commission for those elements and services.
- 2. In June of 2002, the Commission issued Decision 64922 setting new rates for Qwest wholesale customers. Qwest failed to implement the rates ordered in Decision 64922. The above-captioned proceeding was initiated by the Commission to compel Qwest's compliance with Decision 64922.

- 3. AT&T is directly and substantially affected by Qwest's refusal to implement Decision 64922.
- 4. AT&T's participation in this proceeding will not unduly broaden the nature or scope of the Commission's inquiry.
- 5. If AT&T is granted intervention, communications regarding this matter should be addressed to the following persons:

Joan S. Burke Osborn Maledon, P.A. 2929 N. Central Ave., Ste. 2100 Phoenix, AZ 85012-2794 Rick Wolters
AT&T Communications of the
Mountain States, Inc.
1875 Lawrence Street, Suite 1503
Denver, CO 80202-1870

(602) 640-9356 jsburke@omlaw.com

rwolters@lga.att.com

Wherefore, AT&T respectfully requests that the Arizona Corporation Commission issue an order granting AT&T intervention in the above-captioned proceeding.

Respectfully submitted this 3v day of December, 2002.

OSBORN MALEDON, P.A.

Joan S. Burke

2929 North Central Avenue, Suite 2100

Phoenix, Arizona 85012-2794

(602) 640-9356

isburke@omlaw.com

Attorneys for AT&T Communications of the Mountain States, Inc.